

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF P. LEIGH O'DELL, ESQ.**

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of the Motion of the Plaintiffs' Steering Committee to Exclude the Opinions of Dr. Jennifer B. Permuth.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Jennifer B. Permuth, PHD, MS (General) dated May 28, 2024.
3. Attached hereto as Exhibit 2 is a true and correct copy of the Deposition of Expert Jennifer Permuth, Ph.D., dated June 13, 2024.
4. Attached hereto as Exhibit 3 is a true and correct copy of the Third Amended Expert Report of Judith Wolf, MD (General) dated May 28, 2024.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of Kevin Holcomb, MD, FACOG (Gallardo) dated May 28, 2024.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Excerpt of the Reference Manual on Scientific Evidence, Third Edition (2011).

7. Attached hereto as Exhibit 6 is a true and correct copy of “Variant Classification Changes Over Time in *BRCA1* and *BRCA2*,” Chloe Mighton, et al *Genetics in Medicine* (2019) 21:2248-2254.

8. Attached hereto as Exhibit 7 is a true and correct copy of the transcript of the Deposition of Expert Michael Finan, M.D., F.A.C.S. (Carl) dated May 10, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Second Amended Rule 26 Expert Report of Shawn Levy, PhD (General) dated May 28, 2024.

10. Attached hereto as Exhibit 9 is a true and correct copy of the transcript of the deposition of Expert Kevin Holcomb, M.D. (MDL), June 7, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Third Amended Rule 26 Expert Report of Daniel Clarke-Pearson, MD (General), dated May 28, 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Press Release written by Owen Dyer entitled “Johnson & Johnson Recalls its Baby Powder after FDA Finds Asbestos in Sample” published in BMJ on October 21, 2019.

13. Attached hereto as Exhibit 12 is a true and correct copy of the Analysis of Johnson & Johnson’s Historical Product Containers and Imerys’ Historical Railroad Car Samples from the 1960’s to the Early 2000’s for Amphibole Asbestos, 2<sup>nd</sup> Supplemental Report by William E. Longo and Mark Rigler, dated February 1, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of an Excerpt of the International Agency for Research on Cancer (IARC), Volume 100C, *Arsenic, Metals, Fibres and Dusts* (2012) the International Agency for Research on Cancer (IARC), Volume 100C, *Arsenic, Metals, Fibres, and Dusts*.

15. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/P. Leigh O’Dell  
P. LEIGH O’DELL